U.S. ENVIRONMENTAL PROTECTION AGENCY

PUBLIC MEETING

REPORT OF PROCEEDINGS had on March 6, 1995 at the Granite City Township Hall, Granite City, Illinois.

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MS. PASTOR: Thanks for coming. My name is Sue Pastor. I'm the community relations coordinator for this project for the NL Industries/ Taracorp Superfind Site. And most of you know Brad Bradley, the project manager for the project. And we have another person who may look familiar to you from the last meeting. This is our court reporter that is taking down all the proceedings for tonight. And when we get to the public comment portion on the agenda, if you are going to make a comment, a verbal comment,

come up to the microphone, and just like last time, state your name, spell it, if you need to, if it's a difficult name for the court reporter to pick up.

I hope you all signed in. We have two sign-in tables, and that will ensure that you stay on our mailing list, and make sure we have your correct name and address, your name spelled correctly, and your address is current. And the agendas, and we also have extra proposed plan fact sheets. So if you didn't get one in the mail, or if you would like an extra one, feel free to take some more on your way out, and that will explain some of the things that we will be talking about, or all of the things we are taking about tonight, and that is about our proposed plan for cleanup for the site.

If you read through it, we have three portions that Brad will talk about. The main industrial area, and ground water, and remote fill. And he will talk about that, and tell a little bit about the history of the site. Then we will take your questions. Then we'll take your comments. The comment period goes through March 20. By the way, we have had a request for extension for that comment period already. So we will be taking care of that.

That will bring us to something like April 20, April 19. We'll count 30 days, and put a notice in the paper. So we'll be extending the comment period another 30 days.

If you like what you read, and would really like to get into it, we have more documents pertaining to the site over at the public library. That information is in the depository, and the administrative record. That is the file of everything that leads up to our decision here on this project. So if you'd really like to read this sort of thing, we have a lot more over there. Otherwise, hopefully, this will supply it for you, give you what you need.

By the way, we also want to mention that we have the room until 10 o'clock. So we'll need about 9:30 to break up and put the chairs away, and things like that. So around 9:30 we will try to wrap up, and you can hang around a little bit. If you need to talk to Brad afterward about something individual, brad will hang around. But we will be kicked out at 10 o'clock.

One more thing, too, I don't know if you notice, but we have a gentleman videotaping back there. It's just for our internal use. It's not to

put you on television, or anything like that. It's just to tape the meeting, and the presentation, and the comments, and questions that are asked so some of Brad's co-workers can look at that who couldn't come tonight. There's no reason to be leary of that at all.

I'd like to also thank our friends from Illinois EPA who loaned us their slide projector, and are helping with the sign-in table. If you need anything, Michelle is in the back of the room, and she can get you anything you need. Bob Rogers is standing in the back. He is going to work the lights, and he can help you with anything, if you have any questions, particularly State matters. We also have a new person joining our team, and his name is Sam Burroughs, and he is sitting in the middle here, and he will be helping Brad with the field work that will be going on. So if you don't see Brad at all in the neighborhood or town this year, you most likely will see Sam, and you can feel free to hail him down, call him up, leave him messages just like you would do Brad. If you need anything, Sam will be able to take care of you.

So I guess I'll let Brad talk about the

history, and explain the proposed plan to you.

MR. BRADLEY: All right. Let's see. What we are talking about again, for those of you who may not be aware of this, is the NL Industries/ Taracorp Site located at 16th and Cleveland here in Granite City. Do you need more lights down?

What I have up there is just a general site location map, and the Taracorp smelter created several waste streams that we've studied, and had plans to deal with; one of which is the stack emissions that settled in people's yards, and contaminated a lot of the neighboring residential yards with lead.

Another waste stream is the Taracorp pile, which is the large slag heap at the main site area. And then there is a third waste stream where hard rubber battery case material was used as fill material in the neighboring communities, such as Venice and Eagle Park Acres. And what we are here to talk about tonight is the Taracorp slag pile, and the ground water contamination that is coming from that, and also the hard rubber battery case material fill areas. We've done some work on the battery case fill areas, but because there is so many more of them than

we thought intially -- Cnce we got down there, we found out it's really in about every alley in Venice, and seemingly every other yard in Eagle Park. So what we've done is, since that information that we were not aware of at the time of the 1990 record of decision, we're reevaluating that, as well as the Taracrop pile, because ground water contamination that we discovered in 1992 is something that we were also not aware of in 1990 when we had the initial record of decision to deal with that pile.

What I will do is I'll go through the alternatives. We've broken them down into three areas, just for clarity, and also that gives us more options to choose from than if we were combining them altogether. The first area is the main industrial area, and that is the Taracorp pile and the BV&G Transport, Rich Oil property, and Trust 454 property where St. Louis Recyclers used to operate. And the alternatives were alternative M-A, which is really capping the pile. This is basically the same alternative that we had put in the record of decision in 1990 to deal with the Taracorp pile.

Alternative M-B is taking the entire pile and building a landfill on-site, and putting in that

landfill, as well as the contaminated properties surrounding it, such as BV&G Transport, Trust 454.

Alternative M-C1 is source removal to off-site landfill, off-site treatment of hazardous waste. That would be basically taking the whole pile, and other contaminated material around to a landfill, and letting them treat it at the landfill.

Then we have alternative M-C2, which would be simliar M-C1. However, we would treat the material on-site; or another possibility following this would be to take it to a treatment facility, such as a secondary lead smelter that could hopefully deal with the entire pile.

Then lastly, alternative M-D, which is a rather extensive recycling option, where we actually sort everything on-site into plastic, rubber, slag, and every other element that is in the pile, and then try to recycle or dispose of all of those various waste streams separately. We are not going to recycle plastic, and maybe melt down some of the lead. The leakage that we found in the pile --

Just to run you through these briefly, before I explain what alternative we are proposing tonight to deal with the Taracorp pile, we evaluate

this with nine criteria. And you can just read through these briefly. Things like overall effectiveness of the remedy; will it take care of the problem? And what is the long-term effectiveness? Also, what is the short-term effectiveness? Will it create a problem while you are putting it into place? Also, compliance with the applicable laws, and also whether or not we can do it. Obviously, that's important. One, the technology exists, and can it be done fairly easily, and cost, and then state acceptance. What we are here today to address is community acceptance.

Then that brings us to what our recommended alternative about it is. I will say a little bit more about this at the end of the presentation. Our recommended alternative after doing further studies on this and including, you know, the consideration of the groundwater contamination is alternative M-A, which is capping the pile. Basically the same thing as we proposed, or as we actually put into the record of decision in 1990.

Now, with respect to the remote fill areas, again we found a lot more of them than we had anticipated, and some of these area are a lot worse

than others. Some of the alleys have battery chips, you know, from street to street; other ones just have a few chips mixed in over a rather extensive length. And we have two proposals. We can either deal with it the way we have been dealing with it, which is RF-B, which is basically remove it if it's over 500 parts per million lead, and treat it on-site, or at the landfill. That's what we've been doing.

Or we have RF-A, which is a combination. Wherever we have a yard or something that is not a paving use, like driveway or alley, we would dig that up as we have been doing. But with the driveways and alley, we would simply pave over it, if it's not grossly contaminated.

And the one we are recommending is RF-A, which is the combination of digging up the ones that have uses that are not paving uses, and getting rid of that, and back filling it, restoring it; and then also paving over the alleys, driveways, et cetera that aren't grossly contaminated.

Lastly, we have the ground water contamination, which is again what we had detected in 1990, and the levels are fairly high. Sometimes they are over 10 times the standard downgradient, or

downstream with respect to the ground water from the pile itself, and the water moves in a south-southwest direction.

And we have alternative G-A, which just basically is monitor the situation, and allow it to attenuate, which means the contaminated levels come down naturally with time. Unfortunately, that will probably be quite a bit of time, because lead doesn't degrade as readily as some other chemicals.

We have alternative G-B, which is basically the containment the water on-site runs down, and then not let the contaminated run expand at all, and then the water that we have to extract, to contain that we would take it to a publically-owned treatment works, which we have got increments.

And the last option for the ground water is more extensive remediation, where we would do the containment, but also install what is known as a slurry wall, which is a vertical barrier that would prevent the ground water from moving any further in a given direction. We put the vertical barrier up to keep it from moving any further, and then also extract the water as in G-B, and dispose of it at the local public ground water treatment works.

And in any of those options, we would also monitor it. We would be monitoring the situation. The only way we have to do that is to follow the initial network of wells that was placed and don't really go off the property. It doesn't go any further than Trust 454, since we have contained it in those wells. We've got to put some wells further down in the south-southwest direcion to see how far the contamination has gone.

And the recommended alternative for the ground water is G-B, which is basically containing the contamination and disposing of the water that we have to extract, contain that at the publically owned treatment works.

Then just -- This is just a summary of the recommended alternatives. And the next step that we are going to take is, as Sue said, we've already had a request for an extension for the public-comment period, which brings us up to something like April 18 or 19. Once we get all the comments in, then we will prepare a responsiveness summary to those comments. Then we'll issue a decision backing it that will explain, you know, what we are actually going to do for those three source areas that are the Taracorp

pile, the ground water and the remote fill areas that we have dealt with already. And just to give you a kind of guideline, we hope to complete that analysis and response to the comments by approximately the end of June this year.

And I want to just go through three points briefly. There may be some misunderstanding with respect to what capping is. First of all, and I worked on another site, an asbestos site, that is obviously not too attractive as the Taracorp pile is, and this is an aerial view of the site before we did anything. You can see the white area where they had been dumping fiberglass and asbestos. There is a lot of water in there where they settle out the asbestos and fiberglass fibers from their waste water, and then there is also some dry waste areas where asbestos fibers are basically sticking right up in contact with the air.

And this is located right on Lake Michigan. And then this is what some of the close-up shots look like. They used off specifications rolls of waste; basically sludge to build this. This is what it looked like before we did anything. This is all waste material, and there is a shot, a long one, of the

ponds. Again, all of that stuff in the foreground is either asbestos in a free form, or an asbestos-containing product that's off specification.

And then the shot here is -- This is after we had done the surface grading of the site, and had placed the first layer of the cap. In this case, this cap is a little bit different than what we would do here. The first layer was sand. So what you see there is now sand. Sand is covering all these asbestos-containing areas. And then lastly we put clay, then topsoil down, then planted sort of a native grass species on top of it. The grass had not fully grown at this point. You can see all the green area where the grass was taking at that point. That was a couple years ago. Now it just sort of looks like a park up there. And I know that I have heard some people say some comments about capping. I just want to clear it up, that what we are talking about is not going to look like it does today. It will be something where we put roughly a three-foot layer of various materials over it, and grow vegetation on top. You can turn the lights back up at this point.

Another issue I wanted to just briefly address was the idea of dust when we would be grading

the pile for the capping. And this is something that we've done a lot of research on with the realization that in moving this material around there is a potential that dust can be generated. Simply watering or something like with a firehose probably wouldn't control it. But what we've put into a cross testing for capping is a provision for rather extensive dust control measures. We feel that we can certainly control the dust at acceptable levels, which will also control another concern, and that is recontamination of the yards that have already been remediated. There are a handful of yards that have been cleaned up that are all very close to the smelter and the Taracorp pile, and we feel that we can also control that.

And lastly, just a word on, you know, the reevaluation we went through why we are proposing the capping. I think that we probably -- the biggest burden on everyone's mind is what we do with the pile more so than probably remote fill areas, especially in Granite City. And what it boils down to is capping and removal of the pile would both take care of the direct contact problem. If someone were to climb the fence and get on the pile, the cap would put about a three feet barrier between that person and the waste

material. Taking the pile out obviously would get rid of the problem entirely, but both of them would take care of an individual actually getting into direct contact with it. And in the case of a kid getting it into their mouth and ingesting it. Then another concern with the pile is dust. Although dust levels are not over the standards, it's obvious that there is some dust that is still released from the pile. Capping would take care of that, as well as the removal of the pile entirely. And the only major difference between the two is if you take the pile out, you've taken the source of the ground water contamination away. If you cap it, what that does is drastically slows down the rate at which the lead leaches out of the pile. It's not clear to us whether that rate would be within the standards or not at this point, but the difference in cost between the two is about approximately $30 million. To cap it is about $5 million, to remove it entirely is about $35 million, and what we've faced was a decision of, okay, if we spend $30 million to get rid of it, what do we get back? We really don't get a lot back for that. All we do is remove the source of the ground water contamination, but under the alternative that we are

proposing with the ground water alternative, G-B, we are going to contain that contamination, and we also don't have anyone drinking that ground water. We don't have anyone here identified. We checked, and I think everyone is on City water. That is really why we are faced with a cost effectiveness decision. That is why we chose the capping. We didn't feel it was worth $30 million more to take care of a ground water problem that we can actually contain quite easily for a lot less money. And we did do a lot of research on it. That's one reason why -- We had initially wanted to combine this public meeting with the public meeting we had a couple months ago with the soil cleanup level for the residential areas. But we did a pilot study on the pile where we actually were doing six test pits into it, and we saw -- We wanted to see how effective our dust control measures might be. We also checked for lead contamination or organic contamination and fuel value for the purpose of seeing whether a secondary lead smelter might be able to take the pile. And unfortunately, the results of that made it clear that if a secondary lead smelter were to take the pile, it would take them a long time to get rid of it, because the lead content was so high that they would

have to mix in a little bit of this pile slowly over time. And just a ballpark estimate of 20 years was given to us. But I went by an individual's estimate that it would take 20 years to get rid of that pile at that rate. And with all of that in mind -- We didn't get a firm estimate from any smelters, either. We got indications that the cost of taking it there would be similar to the landfill option, which is about $35 million. So that is the research we did on it, and we checked the cost estimates very carefully. Because, to be honest with you, I would rather have the pile out, if we could afford it. We are just not getting much result for the extra $30 million.

So with that, we will just move on to the questions. Okay.

MS. PASTOR: What questions do you have for us? Anything? Would it be easier -- I don't know if you need to come to the mic. Can you?

Q. No. You can hear me. I can yell for hogs, and they'd hear me. My question is: You are talking about pumping the water out of the ground and putting it into our sewer lines to go out to the treatment plant, and expect our treatment plant to treat the lead before the water is put out into the

Mississippi or whatever. I think it's the Mississippi. Now, what in the world do you use to kill this lead? I mean, it's been seeping into the ground for so many years now, how do you kill it? What do you use?

MR. BRADLEY: Well, you don't really kill lead.

Q. Well, I know.

MR. BRADLEY: I understand there are some compounds that can actually destroy certain things. Unfortunately, that is not the case with lead. But what you do is if it's feasible and it exceeds the standards for this stream, which I guess it would be in this case, since it's over the limit, it would basically just who knocks it out of the water and makes it so that the lead can be combined with something that would just take it out of the water, stop it. That is what this would do? I wouldn't want to see it just pumping right into the Mississippi.

MR. BRADLEY: No. We would extract it from several wells. And some of the wells might not be contaminated. We might just need to do that to contain it. Obviously, some of the ones we wanted out where the edge of the flume is we will be overseeing

by the flume, and we wouldn't discount that, because not --

Q. The reason I ask that question, too, I know of so many people that have wells in their yards just to, you know, water the grass. And, you know, if it's got lead in it, it would be going right into the ground where they are watering.

MR. BRADLEY: Yeah. Well, that is true. One thing that would be important to utilize is if the ground water is flowing as slowly as we seem to think it does, it may not run at all. Even though it's been years and years, the pile has been impassive. But that is something we need to determine.

I know of one individual who has a well for watering that we are going to test to see if that's actually something that has picked up the lead. I don't know if it's down any further. I don't know how many other people have. He is the only one I am familiar with. We will check that and see what we get. Just so you know, the relative concentration when you are dealing with the water, the standard is -- The state standard is 7.5 parts per billion of lead. It's actually very diluted. That's the -- That is what causes the health impact when you are talking

about soil, the level that the EPA has been using for its cleanup, 500 parts per million to clean up for that, such as soils, that's actually about a thousand times more concentrated. So if someone is actually putting in water on the surface, it's not nearly as concentrated as the lead in the ground already there in the contaminated sources. I don't know to what extent the buildup is over time, but it's not nearly as much of a problem as the smelter stack was. It won't create this magnitude of a problem where you have, you know, gross numbers of blocks that are contaminated over the cleanup levels that were chosen in this case. So, it's still a concern. We want to check this, but I don't believe the levels are that much different. I don't think that would be a serious problem.

Q. Do you know of anybody that has these wells? Do they have the water treated somewhere?

MR. BRADLEY: We are going to test one of them. It's close enough that it's probably one of the best ones to test. We'll see, first of all, if it's gotten that far. And since those wells really are drawn off the surface, I don't know whether they will be at the same level as the wells that we've drilled.

We've drilled some at the surface, some deeper; some are around 70 feet deep. So it will be interesting to see, first of all, who has it; and if so, does it match up with the water we have. We are going to check that seems that's the pattern this has given off so far.

Q. Next question: I understand you are just going to level this pile off. Is that your idea, level it off and cap it? Is that what you mean?

MR. BRADLEY: No, it's not to spread it, but leveling it off is the wrong way to describe it. It has contours of its surface. There are some bumps and some valleys, and we need to smooth those out. But we wouldn't just flatten it to say three feet over 10 acres. Right now it's something, I guess, like maybe 20 feet tall at the peak, and covers three and a half acres. We have soil around it that has some battery chips, and also a high level of lead contamination in the Transport and the Trust 454. We can use to sort of fill in some of those valleys. One thing that is a problem that will require grading of the pile and is something we'd like to minimize, is that regulation for the smelter slope. Besides the slope of the cap, it will be a much more gentle slope

than what they have on the edge of this pile currently. So with Taracorp sitting right next to the pile, and some rather steep slopes, we will have to pull some of that back. Otherwise, you have to build it out onto the paved area, which is not something we want to do. There will be some grading. In fact, on the borders, one that borders 16th, which is right up against the rail, there is a street. We might pull that back. Also, the side that faces into Taracorp's paved areas, we will have to also pull that back and slope it. Otherwise, we will try to, you know, not level it out, but grade it to a smooth surface with the material that grows up around it, and try to minimize the area we have. The less grading we have to do the better. But we are not flattening it, not at all.

Q. That's what I wanted to know.

MR. BRADLEY: We might get it a little bit shorter than that, but it's not going to be flattened. That's actually something we would be interested in hearing comments about. Flattened, in your eyes, or, you know, just think about it.

Q. You actually expect to pump out all the water, super soil water, through sewers or pipelines

in the treatment plant?

MR. BRADLEY: We don't have to pump out all the water. What happens is when you have sources of contamination, you get what is called a flume that comes from that. And that kind of tends to have certain dimensions. Generally, in most cases it's shaped kind of like a pear. Right at the source it's thinner, and as it goes out, it's gets fatter like a pear. All we have to do is control that part of the water where the flume is. We generally wouldn't be putting the wells right at the edge of the flume. We'd put it in a couple hundred feet, because when you pump, you are actually pulling that leading edge in anyway. I don't know what you mean by pumping all of the water, but we have to deal with a relatively small area, too.

Q. How are you going to determine how much water you are going to get out, measure it? Doesn't it contaminate any of the surrounding well water?

MR. BRADLEY: What do you mean by --

Q. Why are you removing the water in the first place? You are removing it to get the lead out, because you're worried about what she said that some people have wells in their yards that they water

gardens and vegetables and everything else with. This leaded water and contamination of any other well water would be in the area. We've got layers of water. Every time we get a flood, that area fills up again. Whether you realize that or not, you are not going to get rid of that, and have that lead pile, and always have problems with the lead seepage into the water. That gets under there then into the surrounding underwater area.

MR. BRADLEY: Yeah. The reason that we are doing it isn't just the idea of people putting in shallow wells to water lawns. It's really that we have, you know, we have contamination coming from the pile, and we don't really just want to let it go unchecked. And we are not pumping it out necessarily with the lead out as much as to make sure that the number does not get bigger, and get into an area where it may be at some point someone may actually drill a well for drinking water. I don't see that happening. But I don't think it's also a very good approach environmentally to just allow a contaminated flume that has the higher levels that we see here to just go without any kind of extraction.

Q. Let me mention one thing. It seems to me

like the sequence -- That your operation has not really addressed the real primary thing, and that is that pile is the real big headache in this whole deal. It's what has caused it. When the lead operation was working, it spread the dust. Why don't you take care of the lead pile before you take care of the yards and everything else in the area? You can possibly recontaminate adjacent areas.

MR. BRADLEY: Okay. Yeah. That's something we've fully been through on several occasions. The reason that we are doing it in the sequence we are doing is, number one -- Your concern is a legitimate one about recontamination. It's also something we are concerned about. We feel we can control it, or we would not propose to do anything that grades the pile, or moves it in any way. We can control that, and it wouldn't lead to significant recontamination. It is our best judgment that the yards that children play in that have higher contaminant levels are really the priority. And that if you look at what someone is being exposed to in a yard, kids can play and actually get right into the contaminated dirt. They can get that into their stomach, and into their blood stream. And actually we

have had some blood lead levels in blood that are over the cutoff we like to see; a blood study that was done on the pile. The entire area is fenced off. So someone getting on the pile would be very difficult. Certainly the target group, which is smaller children, would be very unlikely to get over the barbed wire fence into the pile. So, it's not really something we feel needs to be covered. That is not really a pressing issue, not nearly as much as kids that can get right into a yard that is contaminated.

As far as dust goes, you know, monitors have been operated for a number of years by Illinois EPA to check for levels of dust that is coming off that area, not just the pile. But in the past, there is also a smelter stack, and that effort is what initially lead to the, you know, the smelter shutting down is that the levels were sometimes four times the standard for lead back in the early '80's. So the smelter operation itself shut down, and also the St. Louis Lead Recyclers shut down their operations, pulling portions of the pile trying to recycle some of the lead. Since then the lead levels have been much lower. And in general, they are about one-tenth of the standard to about one-eighth of the standard. So

they are low. We don't feel that health standards for that is being met very well at the area around the pile. One thing we may want to do is put some monitors a little closer into the pile, because there are two of them that were taken out of service since the lead levels started going down. Two of them have been taken out of service. We don't feel that is a significant problem either. It's well within the standards. As far as the ground water is concerned, you have to have a complete pathway to actually have a health concern. We know that the leads in the water, someone actually has to drink it for it to be a problem. I don't mean we don't need to address it. But again, it's just not as much of a pressing need as a yard where a kid can get directly into it. That's why we prioritize the yards over the pile. The more highly contaminated ones we'd like to do first, and we feel we can also control recontamination, and that that wouldn't be an issue when we get to the pile.

MS. PASTOR: We want to give some other people a chance to ask something.

Q. One more comment. There are kids playing in the ground, and if you look at when the lead plant, lead operation -- Most of the people in that area

still live in that area and grew up in it. They have had no problems with lead. I'm one. I have lived there all my life. I have played in the dirt. We used to bake potatos in the dirt, and we used to dig in it, and everything else. I still grow vegetables in that. There is no after effects where you're any worse than the kids are right now. Yet we are showing you after effects; that there is none. So why are you worried about it today with what diminished dust levels and so forth that we are having compared to what we had when we were a kid?

MR. BRADLEY: Well, actually, everybody reacts differently to lead. And for every person that says what you say, there are people who tell us that they feel they have an impact on the lead with respect to the lead levels. The air wasn't much higher prior to 1983. However, the soil levels peaked right there, and they really don't change much over time. So levels weren't really as high in the past, because it had not been established yet; it was still depositing and building up.

But you are right that the smelter stack in operation was a big problem. I don't know how to answer that, because like I said, for everyone that

says there is not a problem, there are other people who will say the opposite. And there was a blood study done, and 16 percent of the kids that were under six years old had a level that was over 10 micrograms per deciliter, which is what health officials are saying is a level of concern. So basically, I'd have to disagree with that.

MS. PASTOR: There were some other people with hands up. You had a question?

Q. I wanted to comment.

MS. PASTOR: We aren't doing comments now. We'll come back to comments. Let's let people get their questions off their chest.

Q. I'd like to address some situations that existed during the comment section.

MS. PASTOR: We will catch you during the comment portion.

Q. I'd like to know how much money has been spent totally so far of this project from the time it started until -- started to study it, through all the legal fees, the cleanup, the studies that you have done, and I'd like to know -- I know you don't have that figure, but if you ballpark it for me? The fact that you've chosen the least expensive solution to the

pile in not moving it, does that have anything to do with the current Congress, change in Congress? Does it have anything to do the Superfund being -- coming up for --

MS. PASTOR: Reauthorization?

Q. Thank you. -- reauthorization? Or is there a tie-in there? Because it seems that from the time that you started addressing this you seemed to be most concerned about the health, and then not moving the pile seems to go against that. I wonder, is there a connection with it?

MR. BRADLEY: Okay. Actually, I think you asked about three questions, maybe more than that. But I can't speak for the legal costs of the responsible parties. I have no idea what they have spent. I don't know that, or have an accounting. EPA's own legal cost, what we have spent, we did not -- EPA did not do remedial inspection of this project. That's NL Industries did. I don't know that they ever gave us a price quote on that. It generally runs in the range of -- back then, probably $400,000 to $800,000.

I know what EPA has spent on design. Designing, in large part, involved testing everyone's

yard to see what each yard's lead level was, whether or not we needed to clean it up. We've spent about two and a half million on designing, testing, and sampling ground water, and all of those activities that don't have to do with cleaning it up. What we've spent on cleaning it up, so far the bulk of which was spent in Eagle Park and Venice with the battery chip area is about $13 million, and we have some left to do in those areas. We just started to get into the yards in Granite City, and basically the yards that are impacted by the stack emission -- I really don't know what the legal costs add up to. Now, as far as a change in the Congress, I don't really see that that figured in. What we did was when we had that, and significant information in the form of ground water data, they told us now we have ground water contamination, it really pivoted on whether or not you filtered the sample, filtered the sample after -- I'm sorry. Not after you took them out. This contamination had been there before. It's just the state of the art at the time was to filter those samples. That's why.

Q. You didn't change your plan -- Didn't you not change your mind to renew the first time around?

MR. BRADLEY: No, we didn't. No. The plan in 1990 was to cap the pile. Basically, what is being proposed today.

Q. So how was the ground water affected? There is lead in the ground water. How does that factor into anything?

MR. BRADLEY: Well, what it did was we felt we had to revaluate it, because if the pile were there, there were no ground water contamination coming from a miracle, and you really have a doubt in the first place, then that's a different situation. We need to look at it again. But we know where the ground water contamination came from. So we look at it. Really, no one drinks it. And we looked. We did a lot of the studies on the pile trying to figure out, is there any way -- We knew it was extensive back in 1990. Is there something new that came up that would be able to take care of it, completely remove it for a lot less? Is there anything new on it? There really isn't. We did some specific studies on the pile to see how successful dust control measures might be, because that figures in a lot. And also we did some specific tests that would be relevant to whether a secondary lead smelter, because that may have -- We

felt that might be a more affordable option than say landfill, or some of the other things that were available. So we did these studies, and we've included that $5 million to cap it versus $35 million to is the best estimate we've got out there to do anything that has full removal of the pile involved. We are not really getting the benefit back from it. I don't really necessarily think that leaving the pile is a more lenient remedy, if that's the way you want to put it. In the short-term, it's better, because you don't have to move that entire pile. So your short-term effect from any dust that might be generated, or even the fact that you have to manage that dust is environmentally diminished by just having to grade some of the pile, instead of moving the whole thing. So, it's better in that respect.

What it doesn't do is get rid of the source of the ground water contamination. So what we are doing to address that is the combination of capping the pile, and containing the flume is going to be effective in taking care of all of the possible health problems that could come from that pile. And it's roughly $30 million less than getting the pile out and downsizing the ground water. If the pile is

off, you obviously don't need to contain it, at least as long, if at all. But that's not the expensive part. The expensive part is removing the pile

Q. When do you plan to start cleaning up the yards at the present time?

MR. BRADLEY: Okay. That is sort of a side subject, but we have --

Q. Not for me.

MR. BRADLEY: I know that's real important to you, and I have no problem answering it. We had a temporary restraining order filed against us by the City of Granite City when we started to clean up some yards. Ultimately, the resolution of that action was that we, the EPA, cleaned up 17 more residences, which were all in the 1400 block area of Grand, Madison, and State, and that we would -- There were several other, you know, details to that; such as a study that would be conducted by Granite City during that period of time. But also we were to conduct another public comment period. That is something we actually agreed to before this temporary restraining order all rolled up into the same agreement. We've conducted that public comment period on the 500 parts per million soil cleanup level. It was extended

twice. The comment period itself, it ended on January 13 of this year. We received extensive comments, primarily from the responsible parties and the City of Granite City that required us to, you know, actually take a lot of time to answer them. So as soon as we get our responsiveness summary out to those comments, and a decision document saying what is the cleanup level for the residential soil, we can then pursue cleaning up more yards, which is really what we would like to get going on. But that is what happened. That was extended a couple times to January 13, ultimately, and then we've had, you know, it's taken a lot of time.

Q. Do you have a target date?

MR. BRADLEY: I can't really pin anything down. We are going to try to get it done in April. That's about all I can say. We'll try to get out and start cleaning up residential yards, probably mostly in our area where we would start in April, as soon as we get that decision out. We will try to clean them up as soon as possible after that. We are tied to that in a court agreement right now.

Q. Will this decision that you are coming to, will that change your parts per million, or is

that anything to do with your decision on this?

MR. BRADLEY: You mean what we are here for today?

Q. No. You're sounding like now it's 500. Is this going to be raised, complying with somebody else's demands or wishes?

MR. BRADLEY: Well, I can't really say that, because we are not answering all the comments. We are going to, you know, make a statement on that once we get all the comments and have evaluated the whole situation. I mean, if I said something now, it's really before the decision has been made. I really can't say. I don't know what it is, but that decision, when we close out this court agreement, that is the decision that we will be printing. And it will also attach responses to all of the comments that we are receiving. So that's the decision I'm talking about that will come.

Q. So we should hear something by the first part of April?

MR. BRADLEY: That is what I certainly hope you do.

Q. He is not going to have it the first part of April. You are not going to get comments in then.

MR. BRADLEY: He is talking about something else. That was a comment period that ended January 13. That has to do solely with the residential soil cleanup level. What we are here to do in this comment period currently would end about April 18 is for the pile, ground water, and remaining removal fill areas. It has nothing to did with we say for the residential.

Q. Has anybody in the general area in the 16, 17 and 1800 blocks, have any of them been asked to, or given a questionnaire, or given what their opinion was on the lead level?

MR. BRADLEY: No, not to my knowledge. At least --

Q. Getting back to the ground water, I have a series of questions, so please bear with me. First of all, what do you anticipate to be the flow, hourly flowing of the pumping that you will be doing, hourly, daily? How many gallons are we talking about?

MR. BRADLEY: Well, I don't have that answer on the tip of my tongue. But it's ultimately something that I can certainly look up. One thing I can say regarding that subject, this is something that we did converse with the public owned treatment works

on this. So we know they can handle this. It's not something we picked and didn't know whether or not they could handle. I don't know offhand. I don't have a document I could look at in five seconds.

Q. Brad, I specifically talked with the treatment plant operator, and he indicated that no one from EPA addressed or approached the City with treating this affluent.

MR. BRADLEY: It could have been someone from Wood River. It wouldn't have been EPA employees. They are not the ones that did the research for the cost estimates. I don't know. I'd have to talk to them myself. I don't know.

Q. How many years of pumping do you anticipate?

MR. BRADLEY: Well, we stated for costing purposes 30 years, which is the degree that we are -- Typically, what we do in a situation like this, it really depends on; one, how far it's gone; two, whether or not the capping will control the leaching from that power to a point where the standards could be met quickly. In which case it wouldn't be a lot of years. Or three, what if the leaching rate out of that pile continues to be at the level over which is

the standards, in which case the pumping would go on indefinitely.

Q. Did you figure that cost in your $3 million estimate for the ground water?

MR. BRADLEY: We figured that in a 30 year operation.

Q. Of pumping?

MR. BRADLEY: Yes.

Q. So you do have numbers as to what the volume will be, and the amount of lead in the water, because realistically, this lead you're pumping is going to end up in your sludge, and the City could be very, very badly impacted by this. Our sludge, if the lead content raises too high, then we are stuck with handling a special or hazardous waste. The cost for disposing would go up radically. The cost to all of our industrial users in town that put into that amount of lead into the waste stream will go up dramatically, because Illinois EPA will require us to maintain our levels, acceptable levels of lead in the waste treatment. I mean, these types of, you know -- Just to say we are going to pump this into Granite City's treatment plant --

MR. BRADLEY: I didn't say Granite City,

but --

Q. That's the regional waste water treatment plant. That is the only thing available to you in this area.

MR. BRADLEY: I didn't say it. You said it. But we did research that, and we are basically told that, you know, the levels would be acceptable. That is something that certainly I can answer later, if you want to call me on that. I don't have those numbers offhand. That is sort of a fine detail that is stuffed in the cost estimate.

Q. The last question I have regarding the ground water problem is: What is the contingency plan? You indicated that treating this is a relatively simple process. What if it isn't? What if it doesn't work? What if the flume is halfway to the river? What are you going to do if you can't contain it? What is the contingency plan?

MR. BRADLEY: Well, I do not feel we'd have a problem containing it. It can be contained. The question is, obviously, it if it goes a half-mile, there is a lot more involved in containing it. We need to put more monitoring wells in, and get access to that, because they will be off the site that we

initially put all the wells on, and see how far it's gone. We have, you know, estimates of how far it's gone. We have to see whether that is the case, base it on the flow right how long we feels it's been leaching in. And we don't really have a "contingency plan," because we really feel this will work. I don't see any reason why we couldn't develop one. It's actually something we've used on other aspects of this cleanup, or we have 'what if' contingency plans. But we have not proposed that. Let's see.

Q. Brad, can I ask one question of Illinois EPA?

MR. BRADLEY: It's up to them.

Q. Regarding the ground water, have you signed off on your plan for the ground water?

MR. ROGERS: No, I have not.

Q. I would like to remind the Illinois EPA within the City of Granite City, and I am sure the surrounding communities, millions of dollars has been spent in remediation, protecting the same operation dealing with this lead pile that's working mainly with the gas removal, hydrocarbon contamination, et cetera. I think it's absurd for this same -- I mean, if the argument is going to be nobody is drinking this water,

then why have millions of dollars been spent cleaning up the asbestos? I think it's very important for the Illinois EPA to remain consistent, and recognize that it's going to be very difficult for them to maintain credibility and enforce a plan that they have been enforcing all along, including underground water contamination, and then to embrace the plan. I encourage you to look very carefully, and think about your credibility.

MS. PASTOR: Let's give someone else another chance to ask questions.

Q. Brad, you talked about recontamination. I know we are not here for the residential part of this, but theoretically, since the smelter has been shut down you're eliminating the primary source of the lead, has there been any retesting in the 1400 blocks of State, Grand, and Madison Avenue since that has been cleaned up and done to determine if there has been any recontamination? Is it too soon to do that?

MR. BRADLEY: We'll, we haven't done that. It's something that we probably will do, because we feel. Obviously, that we don't want that to occur. I think, as far as recontamination goes, currently the biggest threat is some trucking lots

that are right around the pile where, you know, when they get -- Lots of trucks do the turn-around in them. They get some rather extensive dust. And what we've done is we've paved those areas with dust control, trying to keep that down until we can remediate those areas. One of them is on the main industrial area. That will get remediated. We really need to get, you know, a decision made on these issues that we are here to talk about tonight before we've conceded what we need to do to clear that up. So I -- That's what we are trying to address, those threats. We have not done any testing. I think it might be a bit soon to do that. I know of other studies that have been done on recontamination. I think, in this case, we probably should just check that ourselves. I don't feel that it will probably be very extensive. But we need to control those dust sources, because I think that could be lead to some type of -- Probably, I think that what is what the rear of the pile will only be a problem, you know, at the time when it's being graded. It really isn't a significant source right now, and we will need -- We will use dust control measures at the point. We feel that whatever we want to do with it. It's been graded, but the truck

lots -- Really no one is doing it, unless we do so. That is why we were putting that into play recently.

Q. What is the lead level of the soil that you brought in to repace the soil in these yards in Granite? For example, did you test it before you put it in?

MR. BRADLEY: Yeah. Yeah. That's one of the tests we got already. We wouldn't want to put something back that is over 500 parts per million. Generally, it runs from 150 to 100 parts per million, more to the lower end.

Q. You'd have to lower that anyway, wouldn't recontamination to --

MR. BRADLEY: Right. The real concern that the EPA would have is if it gets back over the level that is protected. It's not to say if it goes from a hundred up to 300 we wouldn't be concerned. Obviously, that is not good. But we are really concerned to see whether it would actually go back over 500. It's something, you know -- Really, to answer your question, it's something we are going to need to look at since we've replaced some of these yards recently.

We do have sort of a complicating factor

to that in that we really want to remediate entire areas at a time with similar contaminant levels. You know starting and stopped by temporary restraining orders, and other concerns, and that really doesn't help with our trying to prevent recontamination. Because if we could do the whole area that's is the best possible scenario. If we do 17 of them in an area, and the whole surrounding area doesn't get addressed, yet then it can get tracked back and forth between those yards. So in a sense, the recontamination effort has, in my opinion, been hurt, because I don't want to see it happen, but the recontamination has been -- the potential for it has been decreased, at least slowed down, the residential soil cleanup, which is not the way we wanted to proceed.

Q. You had stated just a few minutes ago that EPA has allocated $3 million for the ground water wells. Is that simply for the installation? And if it is, how many wells will be installed, and how deep will those wells be, and what size will the force field be on those wells?

MR. BRADLEY: Well, really I haven't allocated any money. This a proposed plan. We've

received comments on it, and the types of questions you have are going to really be defined in the decision portion. If we actually implement that, and that that cost is really a total cost, and that's installation.

Q. So that's for installation and operation?

MR. BRADLEY: Operation for 30 years.

Q. Thirty years?

MR. BRADLEY: That is typically what we -- Yeah.

Q. I think $3 million, sir, is unrealistic, extremely unrealistic. We have industries that pay over a half a million a year for affluent. I'm asking what the flow was going to be from those wells and everything. That is what I'm questioning the cost estimates on.

MR. BRADLEY: Okay.

Q. If you decide to remove the lead pile, you will still have the ground water problem anyhow; right?

MR. BRADLEY: Yeah, what has already leached.

Q. How long will it take?

MR. BRADLEY: What has already leached

there is still nothing to continue to feed it.

Q. How long would it take to clean up the existing ground water, if you remove the lead pile completely? How many years?

MR. BRADLEY: I don't know. I can't accurately figure, but it wouldn't take very long, because you would know the exact shape of your flume. The pile would be out of the way. We could put wells throughout.

Q. Regardless of if you remove the pile or not, you still have the ground water situation?

MR. BRADLEY: Yeah. What has already leached out is there. It has to be dealt with. The real question is what is going to leak out in the future through capping of it, and then obviously nothing will leak out if you fully remove everything.

Q. So whether you remove the pile or not, you still have a ground water situation?

A. What has already leaked out is --

Q. Shorter term?

MS. PASTOR: Someone else had a question that hasn't had a chance to ask it?

Q. This question is for the money. Is this being federal money, or state, city, county?

MR. BRADLEY: Well, here is how it works: It's not City. It's not County. Right now, it's been Federal, because the companies that are potentially responsible for contamination, the EPA and these companies have not agreed on the cleanup plan. They are not currently putting in into place; we are. So right now it's Federal money. When we spend Federal money to clean up a Superfund site, which is on the National Priorities List, the state EPA, which this is, which the state itself kicks in ten percent on that. Right now, it's federal. It's 90 percent federal, and ten percent state. And it could be the responsible parties, if we get a settlement, and EPA agrees to implement the cleanup. That's what we wanted to do up front at the beginning, but it didn't work out.

Q. Can I ask another question, or are you over a time period? Say since the mid '60's to the present date, have you tried to run a water table analysis on this area in Granite City?

MR. BRADLEY: Well, we haven't done it since the mid '60's. We've been involved.

Q. I knew this back then.

MR. BRADLEY: About '85, in there

somewhere, Illinois EPA did. That might take us back to about '83, maybe a little over that.

Q. That's only excuse about your flume you're talking about? I was around town for a long time, and I know that sometimes the water table is very shallow, and sometimes it's very deep. I guess --

MR. BRADLEY: Well, it fluctuates a lot.

Q. In '93 it was probably over the top of the water table.

MR. BRADLEY: Yeah. I think you were standing in the water table. It does fluctuate a lot. You would expect that in an area that is very close to a significant body of water, the Mississippi River. And also roughly in the flood zone. Some part of -- Some parts around, and, yeah, that is generally what you see. It will fluctuate. And I would say that the only trend I have really seen over this 10 years now is it seems to be a little bit lower on the average than it was 10 years ago. A lot of the wells we've drilled to check the shallow water quality are dry. They were dry sometimes 10 years ago, but they were drilles certainly not to be dry. I mean, I would say it;s gone down a little bit over the last 10 years. I

am not sure why.

Q. I mean, to be perfectly honest, when we was having hard rain, let's say, our sewage treatment plant has problems handling that water. Are you going to have somebody down there to shut off your little pumping pumps when the water volume is high, and turn them back on when the volume is low, or are you just going to pump this leaded water right on out into the Mississippi River?

MR. BRADLEY: Well, we wouldn't bypass the system in the treatment plant.

Q. What is going to happen in the treatment plant is going to happen that they can't handle it?

MR. BRADLEY: Well, let me explain that the ground water is very slowly -- I don't think if we get in a situation where we would have to shut some wells off, it's not going to impact the flume much at all to temporarily shut it down. Water is moving so slow that we're pulling it back. Then shut it down for release it, or we want to get out beyond what we initially pulled it back from in the first place. I don't see that that would be a problem, unless it was like a terminal problem in which case we would have to find something else to do. I don't know if the water

moves so slowly as you get closer to the river.

Q. Well, I would just go back again then I will yield the floor, I can remember in the '60's, for example, when you had Union Starch, the different steel mills that's been closed down, A. O. Smith, people like that before water out you have the ground instead of pumping it in from the Mississippi River. We didn't have basement busted things of that nature and I know since a lot of the industries went out of business obviously this water is going somewhere down under the ground busting all the basements in the area all over the city. I don't know how up are going to make flume stay the same size when that water, if you pump two million gallons of water a day out of the ground and then quit, or you put it back, you know, because maybe you explained it, and I didn't absorb it

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MR. BRADLEY: In the absence of another pumping source, which there really aren't many in the area, like you said, there is a lot of the industrial use is gone the ground water will move in a predictable direction. So you know where to place your wells. If you want to catch that contaminant flume and keep it from going any further, you will know exactly where to put the wells to do. The only

question is how many and what pumping, you know, you might not pump a little bit faster flow use. That is where design comes in. But it's moving in a predictable direction. And if the flume, you know, let's say, is shaped like a pear, like I said, you don't put wells in close, you put them a little bit -- pull them back from your main source. If the area you are drawing from includes the edge of the flume, don't put the well right at the end. If you were to shut that down, it takes that water awhile to recover, because you have depressed a lot of the water table right around the well, and it takes awhile to totally recover, and then move on again. And it moves so slow that if you shut it down for a couple of days, it will never recover: Most of the area which we are trying to capture it in anyway. The reason it works is because the flume is a predictable direction, and predictable rate. If it moved in all directions, it would probably be impossible to deal with it. You know exactly how it works.

Q. I think what he is mentioning is drinking. I mean, many people drink. You haven't had a chance to address the problem. You people have designed the system. You haven't really figured out

how much water you are going to have to take out, and what you are going to do with it, bringing up this problem that you need to address before you come up with your final conclusion. And what you are going to do. How are you going to do, or else there is going to be a lot of trouble. That is what he is brining up to you here, some of the other things we've all brought up to you you. We realize licenses that you are making, let's say, an approximation and so forth right now without hard facts. What you need -- the fact is some state conclusions there and that's the whole thing. In all of this just like the removal of the pile. You say that costs too much. I think you need to get some expertise in to estimate alternatives of how to remove the pile, say organic separation, meaning separating the organic from the lead constant. Smelt the lead, and you may find that in the long run it may be cheaper and easier and eliminate a lot of the, let's say, long-term problems that everybody is worried about.

MR. BRADLEY: Well, we've done significant research on the pile. And I feel confident in saying --

Q. We haven't seen it.

MR. BRADLEY: -- the cost estimates are solid, and you will see a drastic difference in the cost between removing it and capping it. I don't think we have --

Q. You have this knowledge?

MR. BRADLEY: What's that?

A. Do you have those figures published that anybody can see?

MR. BRADLEY: They are in the second addendum to the study, which is in the library. And we are finalizing the pilot study report, and we will get that in the library as soon as possible. And that's really what came out of the pilot test on the pilot. That report is what we used in the feasibility study. It's more detailed, but it's summarized feasability study as is. And we have looked into the water city approach at your comment, and those are things we do have to look at, but we have done initial research on that just, you know, without contacting people. We did attempt to reach the people.

MS. PASTOR: Did you have your hand up?

Q. The sludge treatment plant, is that at Chauteau Island, and that landfill is adjacent to the water intake across from the water intake from St.

Louis, and it's adjacent to the water pump leads to Granite City. Have you taken that fact into consideration? I know that Craig indicated that it's tested, but I mean, of all the expenses are those possible expenses for the next 30 years, are they realistically estimated for all contingencies for that and will the PRP still be liable? Who is liable then? Who, the taxpayers, the City, or who?

MR. BRADLEY: It won't be the City. I don't know if the City will be. The PRP's never really get out of the cost. So they would still be liable in some way, shape, or form. See, one thing I don't know is what the lead level of the smelter is right now, I don't know the industry in the area are putting in there to begin with. I don't know that offhand. So I am not sure this is going to, you know, are we going to double that is going to be significant, because I don't know what the level is right now, but what we did do is contact one and ask them if they could handle types of levels that we had been dealing with and volumes and we were told that is something that it could handle. That is what we are basing it on. I don't really know all the details about the island and intakes. I think that is

something that probably is taken into consideration set whatever standards they have for the subject.

Q. Who owns the land that is under the pile, and who owns it afterwards?

MR. BRADLEY: The pile itself, that's Taracorp's land, and --

Q. Everything, or part of it?

MR. BRADLEY: No, not every single part of it, but 99 percent of it. But there is a few little sub-piles that were something that St. Louis Lead Recyclers never pocessed. They shut down and left some material they brought in. They put it back. I do believe that is out off Taracorp's property line. The majority of the pile is on Taracorp's property, and that is who would own it afterwards. The pile would be expanded, though, and to cap it sloped. either the slope requirements, it would get area-wise it would get larger.

Q. Where will it expand, Brad, which direction?

MR. BRADLEY: Well, we would prefer that it would expand toward BV&G Transport. But really that's a legal question. We have to work it out. We could also expand it toward Trust 454. That would

make it larger and thinner. It may be a combination of both would be best.

Q. Has property acquisition been included in the capping cost? If I owned that property, it would be awful expensive if you wanted to buy it.

MR. BRADLEY: Except that you are a PRP. I mean, we have considered that in all of what we've done. I don't know that there is going to be a cost associated with it, because the people that own that have a liability, too. So I am not sure exactly what that is going to look like, but it has been figured.

Q. The intent is to come toward State Street?

MR. BRADLEY: That would be the preference. You know, we have to take respective land owners, or see what --

Q. Why wouldn't you go the other way?

MR. BRADLEY: What, toward Trust 454?

Q. Yeah, toward that itself, or toward the river, away from the City itself.

MR. BRADLEY: Well, we --

Q. And the buildings, what do they do with them? They are not using them necessarily in all cases.

MR. BRADLEY: I don't think we want to get involved in knocking buildings down.

Q. It's your propery; why not?

MR. BRADLEY: Well, it certainly wouldn't be our approach to do that.

MS. PASTOR: Is there a microphone? Any other questions out there?

Q. I thought I better ask a question so I can get my comments in. And I feel that we have a credibility problem, as Mr. Tarpoff said. We have self members of the Council -- I'm Kasmir Skubish. I'm one of the members of the City Council. We have the question of whether our comments and our questions that you have addressed will be heard by the people that make the record of decision. Will this be ascertained by people on our motions and comments to see what the general opinion of the population here is?

MR. BRADLEY: Yes.

Q. It will?

MR. BRADLEY: Yeah. Yeah, I will be involved in writing a record of decision, whatever decision document comes out of this. And so obviously, I'm hearing it now. It's also something

that we are having a record written down on. And, yes, this will be absolute.

Q. We have a terrible credibility problem, because back 17 years ago Granite City used to have an air pollution control board. It not notified Illinois EPA, U.S. EPA and contacted National lead about the lead pile going, and the Illinois EPA and at that time took and assumed responsibility to clean up the area, and nothing had been done.

But going further back than that, we have people that live to be 90 or better. Some of them work at the old Heart Metal Company -- That's the origin of that company that used to make lead pellets and bb's for air rifles the kids used to shoot birds and such as that. They sold to National Lead, and National Lead to Taracorp. And all of that time that was involved we never heard of people getting sick from lead, and never heard of anything that the Illinois EPA had done since 17 years ago, or the federal people did and now we are here with the problem of spending huge amounts of money then that Granite City recently the population has recently in speaking in speaking to our constituents and our friends, our friends would rather remove the pile

completely to eliminate an eye sore. I Would will be policemen I can for to us carry on now until forever, unless that pile was removed. It's going to be talked about because of the fact that we don't want another incident like Time Square in Missouri. Then the federal EPA and other people associated with Time Squares recognized that they made a mistake. We don't want the same kind of mistake sake that happened right here. But can you ask ascertain a people living here for years and years. You don't come in with health problems until now, five years ago. Until this particular time. What we really need to address, if you want to do something worthwhile, if the people that hear this, these comments and questions, make a decision to remove the pile. It's as simple as that. We know there is lot of the money spent federal money from the Superfind, but if there is some good to be a obtained by that fact, that's what our people and our friends want to see, the pile removed. If that's the alternative, then it seems like a community based on your targets there were identified remedies. For one, don't you place community welfare number nine. It should be the number one priority, because we live here. We are human. We are thinking. of our health

factors; personal and public health, both. I know councilmen here feel the same way. That's the things that the record of decision makers will have to bear in mind. Otherwise, I think it's useless. Thank you.

MS. PASTOR: Someone else have a question? Did have you a question that you wanted to ask?

Q. I have got a question. You're talking about all this contaminated water that you are going to drag off this area around the pile, and by the time they get it through to the treatment plant, will it be so diluted that the content will be so low that it wouldn't make any difference one way or the other?

MR. BRADLEY: Well, that's a possibility. What probably will happen is that the lead levels in the flow will be looked at. They will see what they need to be treated, if anything. And I don't know it will be so diluted that it wouldn't do anything. It's a good question. We also have the fact that some of the wells that we'll be pumping from may not have the higher levels. so within our own system we are going to dilute it. You won't see the highest level come in from our pipe. It would be mixed in. It would be wells throughout the flume, and some of them will be

pumping from relatively clean areas. There will be dilution within our own system. I don't know whether it would be diluted. I really wouldn't treat it. I guess it would have some treatment involved.

Q. You're planning on piping directly to the treatment plant; aren't you?

MR. BURROUGHS: I just want to jump in here. I have not seen the whole study, since I'm new on this whole in your fact sheet here it says that if the extraction will well on-site if necessary the ground water will be treated on-site, prior to discharge POTW. What I'm getting out of this is that your ground water will be treated on-site to the standard where it can be accepted by the POTW for discharge into the only safe surface water stream. So I am thinking there is no surface water stream nearby disbursing their POTW with discharged treated ground water, but it's not POTW will be compromising the standard. It needs to be treated to discharge it. That is accurate, I am assuming, by looking at this.

MR. BRADLEY: Yeah. Yeah. Yeah. That's what our plan is. I mean, you can do it one of two ways. I know sometimes that the POTW actually does some treatment themselves. But in this case we are

taking the stand that we should actually treat it before it gets there. I guess that really is the safest approach in a sense that comes up with sludge problems and really get our own liability involved that way. We can knock it from the front. I guess, if we make some kind of sludge, or some type of solid out of that, we could deal with it ourselves, which is a minimal impact, and certainly less costly in the long run, if it were to create some kind of problem in the POTW it. That's a correct summary. Yeah.

MS. PASTOR: She had her hand up. I am just going to recognize her

Q. This was a follow-up with his.

MS. PASTOR: Go ahead.

Q. I'll just ask real quickly, Brad, what exactly is going to be the configuration of the pile when it's done? How tall? How wide? What size -- Is it going to be solid enough to put some structure on it, or exactly what is it?

MR. BRADLEY: Well, I don't know what kind of structure you're talking about, but certainly nothing that disg into it to for support. I don't have the exact dimensions. We don't plan on making it taller. We were aware from a public comment period

back in 1990 that that certainly is not a popular idea. It also would create problems in containing, if it's very steep and comes to a peak. It's harder to maintain with a mower or whatever we need to keep vegetation under control. They use a lot of the superfund sites that we have have capped, and put caps on them, and they can be used for beneficial uses like parks, or some of them that are larger than that. This would not be big enough, but they been used as golf courses, and things like that. As far as structures being put on it, obviously that would be something we would put restrictions on it that you can't really dig into it. You know, if someone wanted to put a small structure on it, I don't know that we would disallow that. But it certainly couldn't be -- It wouldn't have a foundation dug into the cap, because then it would actually breach the purpose of the cap.

Q. So it would be sitting go 15 feet tall?

MR. BRADLEY: No. It will be larger in area. It will not be taller. Probably what will make most of the increase in area will be the sloping requirements for the pile. It slopes so steeply now, it doesn't even come close to meeting the requirements

that we will have for the sloping. Some parts that are sloping more gradually, but there are parts that are sloping very steeply. Just to meet the sloping requirements, the area will be increased. We can bring a lot of the material that we have to dig up from Trust 454, BV&G, and Rich oil in to help with that. I don't know what the final area estimate of it is. it will be bigger. It won't be as big as -- It will be somewhere between three and a half and seven acres, I would say.

Q. How high?

MR. BRADLEY: Maybe in the middle of that -- I don't know exactly how high. You know, that's something we need to design. it might be better for some reason 15 feet or 20 feet. It wouldn't be any higher than it is today. But we have to think of the best way to place materials in some of the low spots so we can minimize our grade. I don't think we can get an answer at this stage exactly what the things are looking like when they are designed. When we have all the initial, upfront stuff done, then we can. We can do an approximate cost, but we can't design it it upfront, because that is putting a lot of money into something that may have to be changed,,

based on the slopage

Q. You keep saying we, but has EPA taken over ownership of the pile?

MR. BRADLEY: No. No. We will not take over ownership, but the way it works is that there is it depends on who implements it. Now, if EPA continues to spend their money on this, then the operation and maintenance is EPA's responsibility while it gets turned over to the state. If the potentially responsible parties actually come forward and do this, then it's their responsibility, and will be something that they do under a legal agreement. We will never assume ownership of it. That obviously isn't in our interest. We are just trying to clean up up the problem, not get our own liability. You can see we will maintain, and have this and -- I guess it will depend on different people, depending on who does it.

Q. In other words, Taracorp still owns the property?

MR. BRADLEY: Yes, they do. There is a whole liability to them for that pile, and ground water that I don't want to even get into.

Q. Are you assuming --

MR. BRADLEY: George had his hand up.

Q. Are you going to pipe the water from your pumps directly to the treatment plant, or are you going to use locals?

MR. BRADLEY: Well, at some point out we are going to treat it up front, and I assume we are going to pipe it to the plant.

Q. Say we say that even if you treat it there, if you let discharge -- I think you should pipe it to a treatment plant, rather than use our local.

MR. BRADLEY: That's what I said we would do.

Q. How about where the lead comes from in Missouri? Are those --

MR. BRADLEY: I didn't hear the first part.

Q. How about where the lead -- A lot of the lead is lying in Missouri in those deep down mines. Have you ever considered that all of this pile actually putting in the mines from which it is originally extracted as a fill?

MR. BRADLEY: Well, I guess, yeah, that was considered for about a second, because whoever owns that mine isn't going to want it. You know, they

don't want what they. They don't want to be adding to it. So, yeah, I mean, it was considered. You know, I don't think anyone would accept that. You still have the removal cost and getting it there, and then it's not safe as a land fill. There is nothing to say that it wouldn't just leak out in the ground water after you immediately put it down there.

Q. How about lining some of the tunnels in the coal miles here in Collinsville with it? They've probably started to sink, and using them as fill?

MR. BRADLEY: These aren't really viable options. You're getting into a class of options I don't think people would want that to happen. It's not really a reasonable option.

Q. What do you treat the lead with to neutralize it?

MR. BRADLEY: I don't know specifically. You can -- There is chemicals that you can use to basically draw lead out of water. It's a metal, and you combine it with solids, or draw it down. I don't know exactly what it is.

Q. Is there risk increase?

A. Well, I know that there are obviously lead treatment problems other places in the country,

and I don't know how extensive that is compared to treating and recycling. That is something that we've costed it out, the whole process, and it's --

Q. You say the figure that you got for this project --

MR. BRADLEY: Pardon.

Q. Are you limited to a certain figure for this project?

A. No. No, we are not.

Q. In other words, if they gave you $30 mill to operate $60 or $100; there is no limit?

MR. BRADLEY: Well, it's not that there is no limit. Nobody set a limit. No one said, 'You don't get a $100 million, or $7 million.' We have to always keep in mind the regulations that we have to abide by, and the National Contingency Plan, which we operate under. Because if we spent money that is not consistent with the National Contingency Plan, we may never get it back. We are not spending the money that we've spent already, and just saying good-bye to it. We are going to sue the response parties to try to get that money back, and they may also face penalties for not having done the work themselves. So we have to be consistent with the National Contingency Plan, and

meet applicable laws. These are our limitations. This is no dout a Superfund site, but if you spend money on something inappropriately, we wouldn't get it back. That's a serious consideration.

MS. PASTOR: It looks like we are losing a few people here. I wonder if can move into the comment portion of the meeting then at this time. Then, like I said, maybe we can stay around and answer a few questions.

At this point the comment period, comment portion would be in the form of a statement or an opinion, and a question. And that will be for the record. As Brad said, all of those comments, along with anything we get in writing that you can send to us in the mail, or if you want to say something today. We already have a coment period of time extension. So you have plenty of time to go read up and send something in, if you would like. Otherwise, if you want to make a comment, raise your hand. We will have you come up to the microphone. At this point, we want to make sure the court reporter your name, and if you are representing a particular organization, or an agency, or form of government, or just yourself, that's okay, too, but we want to make sure she gets

everything. So, if someone has a comment, a statement, or something they'd like to say at this point for the record, raise your hand and step on up.

We'll remain open for just one more question now. You want to ask a question?

MR. SKUBISH: The comment I was going to make then is the people that make the decision have set a priority on personal, public health factors, or will it be the dollars and sense business. You said yourself you made add mix no ceiling, no limitation. You said a $100 million. Would the $100 million come first, or would the public health, personal health come first? You can put that down as a comment. I believe that they should remove the pile, and that would eliminate a source of soreness right there.

MS. PASTOR: For the record, your name?

MR. SKUBISH: My name is Kasmir Skubish. I live at 2701 Lincoln Avenue, Granite City.

MR. POLICHECK: I'd like to hear a comment based to this gentleman's question. Make it again.

MS. PASTOR: If you have just a statement then, a thought, a question this is the time to say it. Like I say, if you don't want to say it now think

it over and send us something, that's fine, too.

No comments? Okay. All right. Well, I guess we will close this comment portion of the meeting. Did you want to saying something? Okay. Well, then, I guess we can end the meeting, if that's okay with you. But we have the room for a little while. So we will stay around, if you want to ask Brad a particular question, or something special is on your mind, we'll be glad to stay for a little while and talk with you. Thank you for coming.

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